

1 The parties in this case request an extension only as to the fact discovery cut off. The
2 parties request that the current fact discovery deadline of March 25, 2022, be extended until May
3 25, 2022. The parties also request that the deadlines based on the fact discovery deadline also
4 move accordingly. The respective deadlines would thus be as follows:

- 5 ○ Fact discovery cut off: May 25, 2022
- 6 ○ Expert witness disclosure: July 25, 2022
- 7 ○ Supplemental expert disclosure: August 22, 2022
- 8 ○ Dispositive motion deadline: November 22, 2022

9 A scheduling order may only be modified upon a showing of good cause and by leave of
10 Court. Fed. R. Civ. Proc. 6(b)(1)(A); *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609
11 (9th Cir. 1992). In considering whether a party moving for a schedule modification has good
12 cause, the Court primarily focuses on the diligence of the party seeking the modification. *Johnson*,
13 975 F.2d at 609. Defendant has served written discovery to Plaintiffs. In addition, Defendant
14 seeks to depose the Plaintiffs after written discovery has been responded to. Further, Defendant
15 and Plaintiff Perez have conferred extensively regarding the status of Rule 26 disclosures and have
16 a pending telephonic pre-discovery motion conference with Judge Jeremy Peterson set for March
17 29, 2022. (ECF No. 10.) Judge Peterson was not available to set the conference until after fact
18 discovery cut-off. Because formal motion practice may be required after the conference, the
19 parties believe an extension of the discovery deadline is warranted.

20 For these reasons, good cause exists to modify the fact discovery cut off deadline and
21 related court deadlines.

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1 IT IS SO STIPULATED.

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3 Dated: March 18, 2022

LONGYEAR & LAVRA, LLP

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5 By: /s/ Nicole M. Cahill
VAN LONGYEAR
6 NICOLE M. CAHILL
Attorneys for Defendant,
7 County of Sacramento

8 Dated: March 18, 2022

LAW OFFICES OF TED A. GREENE, INC.

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10 By: /s/ Glen F. Olives [authorized on 3-3-22]
GLEN F. OLIVES
11 Attorneys for Plaintiff,
Kimberly Perez

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13 Dated: March 18, 2022

THE GORDON LAW FIRM

14
15 By: /s/ Chris Gordon [authorized on 3-3-22]
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17 Mitra Holley
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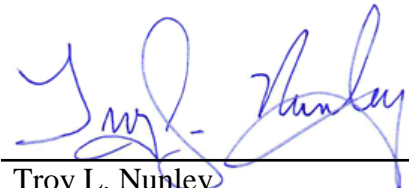
ORDER

Good cause appearing, the parties' stipulated request to modify the Court's Scheduling Order (ECF No. 3) is GRANTED.

The relevant deadlines are ordered as follows:

- Fact discovery cut off: May 25, 2022
- Expert witness disclosure: July 25, 2022
- Supplemental expert disclosure: August 22, 2022
- Dispositive motion deadline: November 22, 2022

DATED: March 21, 2022



Troy L. Nunley
United States District Judge